

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In Re: **JOSEPH DeSANTIS,**)
Debtor)

**CASE NUMBER: 19-13222-MSH
CHAPTER 13**

**DEBTOR'S OPPOSITION TO OBJECTION
TO CONFIRMATION OF CHAPTER 13 PLAN**

The Debtor, Joseph DeSantis, hereby opposes U.S. Bank Trust National Association's Objection to Confirmation of Debtor's Chapter 13 Plan dated October 21, 2019 [Doc. 30]. In support hereof, the Debtor submits the following:

1. The Creditor has not filed a proof of claim stating the total balance and any alleged arrearage.
2. The Debtor cannot appropriately respond to the Creditor's Objection unless a proof of claim is so filed.
3. The Debtor requests that a hearing on this Objection be scheduled after the Creditor files its Proof of Claim.

WHEREFORE, the Debtor requests that the Court deny the Creditor's Objection.

Dated: October 21, 2019

Joseph DeSantis, Debtor
By his Attorney,

/s/ Lawrence L. Hale
Lawrence L. Hale, Esquire
BBO Number 217120
128 Main Street
Suite 7
Carver, MA 02330

Tel: (508) 866-2900

CERTIFICATE OF SERVICE

I, Lawrence L. Hale, Esquire, attorney for the Debtor, state that on October 21, 2019, I electronically filed the foregoing pleading to which this is attached with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

U. S. Trustee's Office

Carolyn A. Bankowski, Chapter 13 Trustee

Andrew S. Cannella, Esquire, Esquire, counsel for U.S. Bank Trust National Association

I certify that I have mailed by first class mail, postage pre-paid, the documents electronically filed with the Court on the following non-CM/ECF participant.

Joseph DeSantis

303 Forest Street

Marshfield, MA 02050

/s/ Lawrence L. Hale

Lawrence L. Hale, Esquire